

1 Stephen R. Cochell
Admitted Pro Hac Vice
2 *srcochell@gmail.com*
5850 San Felipe, Ste. 500
3 Houston Texas 77057
Telephone: (713) 436-8000
4 Facsimile: (213) 623-2000

5 Allan Grant (SBN#213658)
Grant's Law Firm
6 17351 Greentree Drive
Riverside, California 92503-6762
7 Telephone (888)937-7555
Facsimile (866)858-6637
8

9 Attorneys for Defendant
JASON EDWARD THOMAS CARDIFF
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11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
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14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 JASON EDWARD THOMAS
18 CARDIFF,

19 Defendant.
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Case No. 5:23-cr-00021-JGB

**DECLARATION OF STEPHEN R.
COCHELL IN SUPPORT OF
JASON CARDIFF'S *EX PARTE*
APPLICATION FOR AN ORDER
PERMITTING INTERNATIONAL
TRAVEL AND RETURNING HIS
PASSPORT**

*[Filed concurrently with Ex Parte
Application and [Proposed] Order]*

DECLARATION OF STEPHEN R. COCHELL

I, Stephen R. Cochell, declare as follows:

1. I represent Jason Cardiff in this matter. I make this declaration in support of Jason Cardiff's Ex Parte Application for an Order Extending International Travel and Returning his Passport.

2. Mr. Cardiff has been released on a \$530,000 appearance bond, justified in the amount of \$500,000 with full deeding of real property. His release conditions include: a travel restriction to the Central District of California and the Southern District of Texas; a curfew between the hours of 8:00 p.m. and 8:00 a.m.; and, placement in the custody of third-party custodian, Attorney Stephen Cochell. Lilia Murphy and Brian Kennedy executed affidavits of sureties in support of the bond. Ms. Murphy also deeded her home as collateral. The December 6, 2023 Release Order and Bond Form is attached as Exhibit A.

3. Mr. Cardiff is living with Attorney Cochell in the Kingwood, Texas, and he is being supervised by United States Probation Officer Jack Sherrod of the Southern District of Texas.

4. On July 22, 2024 and September 3, 2024, this Court granted motions filed by Mr. Cardiff asking permission to travel to his home in Dublin Ireland and that the Court release his passport Dkt. 87-2.

6. Counsel was informed that he stayed in touch with Mr. Sherrod, his pretrial services officer, during each of these stays and kept him abreast of his whereabouts and schedule. Mr. Cardiff has stayed in touch with Mr. Sherrod during this current stay. Mr. Cardiff returned to the United States without incident. Mr. Cardiff has traveled on business on a number of occasions, also without incident and consistent with the Court's prior orders allowing travel.

7. The Court previously granted permission to travel to Ireland to assist Mr. Cardiff's wife for her medical needs and to help care for his ten year old daughter. As set out in his request in that previous request, Mr. Cardiff had also scheduled

1 necessary medical appointments for himself, including a consultation with his
2 cardiologist. Unfortunately, Mr. Cardiff's cardiologist, Dr. Hazel Byrne has referred
3 Mr. Cardiff for a full cardiology workup. Mr. Cardiff also had unanticipated health
4 problems. Counsel has received correspondence from Dr. Maura Stafford,
5 Bellbridge Medical Centre referring Mr. Cardiff to the Blackrock Clinic Spirometry
6 Department finding him "medically unfit to fly until further notice" pending further
7 testing. Mr. Cardiff is being scheduled for further testing for those issues but (as in
8 the United States), scheduling with subspecialists is not immediate.

9 8. Additionally, it is requested that Mr. Cardiff's electronic monitoring
10 device be removed to enable him to undergo through an MRI (Magnetic Resonance
11 Imaging). Counsel is informed that health personnel in Ireland informed Mr.
12 Cardiff that the metal in the electronic device would interfere with health personnel
13 taking the MRI. Counsel for Mr. Cardiff stands ready to provide the Court with the
14 correspondence and medical records supporting this request for in camera review.

15 9. Mr. Cardiff does not have medical insurance in the United States but
16 does have medical treatment available in Ireland.

17 10. On November 11, 2024, United States Probation Officer Jack Sherrod
18 was contacted on November 11, 2024. In response to a request by Mr. Cardiff, Mr.
19 Sherrod stated: "Hello Jason, I will have to defer to California on this one. A 30
20 day extension is a long time. I don't have a reason to oppose, so that's what I will
21 tell them. Removing the tracker poses a big problem. I understand the need its just
22 that you will not be tracked until you come back and have it installed. The court
23 would definitely need to address this issue." (emphasis supplied)

24 11. On November 15, 2024, I contacted Valerie Makarewicz and Manu
25 Sebastian, attorneys for the Government and provided them with a draft of Jason
26 Cardiff's Ex Parte Application for an Order Extending International Travel and
27 Returning his Passport.

28 I declare under penalty of perjury under the laws of the United States of

1 America that the foregoing is true and correct to the best of my knowledge.

2 Executed on this 15th day of November, 2024, at Houston Texas.

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4 /s/ Stephen R. Cochell
5 Stephen R. Cochell

6 Dated: November 15, 2024

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